

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Judy Arlene Redmond

Complaint for a Civil Case

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.
(to be assigned by Clerk of District Court)

Plaintiff requests trial by jury:

☒ Yes ☐ No

v.

USA

(Write the full name of each defendant. The caption must include the names of all of the parties. Fed. R. Civ. P. 10(a). Merely listing one party and writing "et al." is insufficient. Attach additional sheets if necessary.)

CIVIL COMPLAINT

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepaying fees or costs.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Judy Arlene Redmond
Street Address	1700 County Road 5610
City and County	Bunker, Dent Co.
State and Zip Code	Missouri 63629
Telephone Number	573-414-9001
E-mail Address	jarjac50@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Rebecca Wertenberger
Job or Title	Assistant Chief Logistics
Street Address	1500 N. Westwood Blvd
City and County	Poplar Bluff, Butler County
State and Zip Code	Missouri 63901
Telephone Number	
E-mail Address	rebecca.wertenberger@va.gov

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. *(Include all information that applies to your case)*

A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII of the Civil Rights Act of 1964 (Title VII)

B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

Secretary Denis McDonough
Paul Hopkins Rebecca Wertenberger James Monahan Jeffery
Serrano Wanda Newton Secretary Denis McDonough

C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

1. The Plaintiff(s)

The plaintiff, (name) _____, is a citizen of the
State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) _____, is a citizen
of the State of (name) _____ Or is a citizen
of (foreign nation) _____.

If the defendant is a corporation

The defendant, (name) John J Pershing VA Medical Center .
is incorporated under the laws of the State of (name)
Department of Vetarns Affairs , and has its principal place of
business in the State of (name) Missouri Or
is incorporated under the laws of the State of (foreign nation)
_____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because (explain):

\$300,000

III. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

Paul Hopkins Medical Center Director in his official capacity as the director and allowed. Rebecca Wertenberger and Jeffery Serrano supervisor James Monahan Employee Relations and Wanda Newton Employee Relations to not accommodate me. The Defendants did the actions in intent to get me to quit my job. The federal employees followed unlawful orders to discriminate against me that caused me emotional trauma and loss of pay. I have been given the right to file document and have elected the District Court in Cape Girardeau. These events occurred at 1500 North Westwood Blvd, Poplar Bluff Mo. I was given double the workload in 2023 versus workload in 2022 by my supervisors. Workload caused worsening of my medical conditions. I was then denied Reasonable Accommodation by for my physical and mental disabilities. I was informed that double the workload was reasonable and manageable. I was also disrespected by Mr. James Monahan on several occasions and he wasn't my supervisor.

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

Relief requested is \$300,000 dollars for the discrimination and medical conditions caused and worsened by the willful acts.

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

By denying Reasonable Accommodation, I lost 5 years of full-time employment amounting to over \$217K (without raises) I suffered physical and mental pain.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1 day of March, 2024.

Signature of Plaintiff(s)

Judy Culeiro Redmon

When I informed my supervisor and assistant Chief of Logistics, they apologized but told me to not expect him to change. The assistant Chief of Logistics informed me numerous times that my position of Purchasing Agent was not Telework eligible except for Ad-Hoc purposes. I was then asked numerous times if I was resigning despite my pursuing Telework by providing medical paperwork on numerous occasions. Then after providing "sufficient" medical paperwork, two weeks later I signed for a letter "Ordering" me to return to work sick or provide appropriate medical paperwork (that was provided 2 weeks prior to date of letter). I have communications after heated arguments about my accommodation request Wanda Newton and my supervisors as federal employees asking me if I wanted to quit. I have evidence that the federal employees have been found guilty of discrimination priorly. I am not filing workmens compensation because federal employees are falsfying documents and making false statements to get employees claims denied. The federal employees are liaglbels for the misconduct that caused me finacial and bodily harm.